

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO

IN RE:

JOSE LUIS ROSARIO PEREZ  
DEBTOR

CASE NO. 18-06720 MCF  
CHAPTER 13

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**DEBTOR'S REPLY TO TRUSTEE'S REQUEST ENTRY OF ORDER DOCKET  
NO.69**

TO THE HONORABLE COURT:

COMES NOW, **JOSE LUIS ROSARIO PEREZ**, the Debtor in the above captioned case, through the undersigned attorney, and very respectfully states and prays as follows:

1. On April 19, 2023, the Chapter 13 Trustee filed a *Trustee's Request Entry of Order*, Docket No. 69, whereby the Trustee requests the Court to Order the Debtor to tender to the Trustee the 2019 and 2020 tax refunds in the sum of \$1,319.00.
2. On May 9, 2023, the Debtor filed a *Debtor's Motion Requesting Order Re: Ratification of the Use of Fund from the 2019 and 2020 Tax Refunds*, in the above captioned case.
3. The Debtor respectfully states that should the Court grant the Debtor's request for the ratification and authorization to use the funds from the 2019 and 2020 tax refunds, the Trustee's request for the Court to Order the Debtor to tender the aforementioned tax refunds, becomes "moot".
4. Based on the above stated grounds, the Debtor respectfully requests this Honorable Court to deny the *Trustee's Request for Entry of Order*, Docket No. 69, in the above captioned case.

**WHEREFORE**, the Debtor, through the undersigned attorney respectfully requests this Honorable Court grant the foregoing motion and deny the Trustee's request for entry of Order, Docket No. 69, in the above captioned case.

**I CERTIFY** that on this same date a copy of this motion was filed with the Clerk of the Court using the CM/ECF filing system which will send notice of the same to the Chapter 13 Trustee, Jose R. Carrion Morales, Esq., and to all CM/ECF participants; I also certify that a copy of this motion was sent to the Debtor via US Mail to Jose Luis Rosario Perez, RR6 Box 7524 San Juan PR 00926.

**RESPECTFULLY SUBMITTED.** In San Juan, Puerto Rico, this 9<sup>th</sup> day of May, 2023.

*/s/ Roberto Figueroa Carrasquillo*  
USDC #203614  
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